UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JAMES W. DABNEY,

1:23-mc-78-MKV

Petitioner,

ECF CASE

v.

HUGHES HUBBARD & REED LLP,

Respondent.

DECLARATION OF KATHLEEN M. MCKENNA, ESQ. IN SUPPORT OF RESPONDENT'S OPPOSITION TO CLAIMANT'S PETITION FOR AN ORDER TO SHOW CAUSE IN AID OF ARBITRATION

Kathleen M. McKenna, Esq. declares, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury, that the following is true and correct:

- 1. I am an attorney admitted to practice before this Court and am a member of the law firm Proskauer Rose LLP, attorneys for Hughes Hubbard & Reed LLP. I am fully familiar with all of the facts stated herein and make this Declaration on personal knowledge.
- 2. I submit this Declaration in support of Respondent's Opposition to Claimant's Petition for an Order to Show Cause in Aid of Arbitration.
- 3. Attached hereto as Exhibit 1 is a true and correct copy of correspondence that I received from Claimant's counsel, dated March 13, 2023.

I declare under penalty of perjury that the forgoing is true and correct. Executed this ___ day of April, 2023 in New York, New York.

Kathleen M. McKenna, Esq.